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IN THE UNITED STATES DISTRICT COURT

3

FOR THE DISTRICT OF DELAWARE

4

C.A. No. 04-1300-SLR

5

6 ETHYPHARM S.A. FRANCE)

7 and ETHYPHARM S.A. SPAIN)

8 Plaintiffs)

9 vs.)

10 BENTLEY PHARMACEUTICALS,)

11 INC.,)

12 Defendant)

13

14

15 Deposition of Yves Liorzou

16 Washington, D.C.

17 July 7, 2006

18

19

20 Reported by: Bonnie L. Russo

21 JOB NO. 6730

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<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6 July 7, 2006</p> <p>7 9:00 a.m.</p> <p>8</p> <p>9</p> <p>10 Videotaped Deposition of Yves Liorzou held at:</p> <p>11</p> <p>12 Baach Robinson & Lewis</p> <p>13 1201 F Street, N.W.</p> <p>14 Suite 500</p> <p>15 Washington, D.C.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Pursuant to notice, before Bonnie L. Russo,</p> <p>21 Notary Public</p>	<p>1 CONTENTS</p> <p>2 EXAMINATION OF YVES LIORZOU PAGE</p> <p>3 BY MS. ABREU 7, 178</p> <p>4 BY MR. BOSTWICK 164</p> <p>5</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 1 Copy of Business Card for 43</p> <p>9 James R. Murphy</p> <p>10 2 Summary of Meeting 65</p> <p>11 3 Delivery Solutions 108</p> <p>12 4 Manufacturing Agreement 118</p> <p>13 5 Letter dated 11-14-01 124</p> <p>14 6 Letter dated 12-12-01 130</p> <p>15 7 Letter dated 1-2-02 139</p> <p>16 8 Letter dated 1-23-02 146</p> <p>17 9 Memos dated 11-22-00 168</p> <p>18 10 7 Page Document dated 10-19-00 175</p> <p>19</p> <p>20</p> <p>21</p>
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<p>1 APPEARANCES:</p> <p>2 For the Plaintiffs</p> <p>3 DWIGHT P. BOSTWICK, Esq.</p> <p>4 JONATHAN D. FINE, Esq.</p> <p>5 BAACH ROBINSON & LEWIS</p> <p>6 1201 F Street, NW</p> <p>7 Suite 500</p> <p>8 Washington, D.C. 20004</p> <p>9 202-659-7865</p> <p>10</p> <p>11 For the Defendant</p> <p>12 VERONICA C. ABREU, Esq.</p> <p>13 JOSEPH P. MINGOLLA, Esq.</p> <p>14 EDWARDS ANGELL PALMER & DODGE, LLP</p> <p>15 111 Huntington Avenue</p> <p>16 Boston, MA 02199</p> <p>17 617-239-0100</p> <p>18</p> <p>19 Also Present: Valerie Texier, Interpreter</p> <p>20 T.J. O'Toole, Videographer</p> <p>21</p>	<p>1 THE VIDEOGRAPHER: On the record</p> <p>2 with Tape Number 1 of the videotaped deposition</p> <p>3 of Yves Liorzou taken by the defendant in the</p> <p>4 matter of Ethypharm S.A. France and Ethypharm</p> <p>5 S.A. Spain versus Bentley Pharmaceuticals,</p> <p>6 Incorporated, in the United States District</p> <p>7 Court for the District of Delaware. Civil</p> <p>8 Action Number 04-1300-SLR. This deposition is</p> <p>9 being held at the law offices of Baach Robinson</p> <p>10 & Lewis located at 1201 F Street, Northwest in</p> <p>11 Washington, D.C. on July 7, 2006 at</p> <p>12 approximately 9:03 a.m.</p> <p>13 My name is T.J. O'Toole representing</p> <p>14 Esquire Deposition Services. I am the</p> <p>15 certified legal video specialist. The court</p> <p>16 reporter is Bonnie Russo also representing</p> <p>17 Esquire Deposition Services.</p> <p>18 Will counsel please introduce</p> <p>19 themselves and indicate which parties they</p> <p>20 represent.</p> <p>21 MS. ABREU: I am Veronica Abreu. I</p>

2 (Pages 2 to 5)

ESQUIRE DEPOSITION SERVICES

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JT-A-895

<p style="text-align: right;">Page 6</p> <p>1 represent Bentley Pharmaceuticals and with me 2 is my colleague Joe Mingolla also representing 3 Bentley Pharmaceuticals. 4 MR. BOSTWICK: My name is Dwight 5 Bostwick. I am representing Ethypharm, both 6 plaintiffs in this action and with me is 7 Jonathan Fine who will be in and out of the 8 deposition I anticipate. 9 THE VIDEOGRAPHER: Thank you. Will 10 the interpreter please identify herself for the 11 record. 12 THE INTERPRETER: My name is Valerie 13 Texier. I am the French interpreter. 14 THE VIDEOGRAPHER: Will the court 15 reporter please swear in the interpreter. 16 VALERIE TEXIER, the interpreter, 17 after first being duly sworn by the Notary 18 Public, interpreted the proceedings as follows: 19 THE VIDEOGRAPHER: Will the 20 interpreter please assist the court reporter in 21 swearing in the witness.</p>	<p style="text-align: right;">Page 8</p> <p>1 L-I-O-R-Z-O-U. 2 Q. Thank you. And would you also mind 3 stating your residential address and spelling 4 that for the record. 5 A. My residence is in France. It's 16 6 Rue Roger Robereau. Roger is written 7 R-O-G-E-R. Robereau is written 8 R-O-B-E-R-E-A-U. And it's in St. Germain. St. 9 Germain, G-E-R-M-A-I-N, France. 10 Q. Have you been deposed before in an 11 American case? 12 A. No. 13 Q. Let me just review some basics of 14 what an American deposition is like with you. 15 As you know, I will be asking you 16 some questions today. We ask that you please 17 respond verbally so that the court reporter can 18 take it down. 19 A. Okay. 20 Q. Because if you just nod your head or 21 go like this she will have a hard time</p>
<p style="text-align: right;">Page 7</p> <p>1 YVES LIORZOU, 2 was called for examination by counsel and, 3 after having been duly sworn by the Notary, was 4 examined and testified as follows: 5 EXAMINATION BY COUNSEL FOR DEFENDANT 6 BY MS. ABREU: 7 Q. Good morning, Mr. Liorzou. Thank 8 you very much for coming all the way to the 9 United States so that we could depose you here 10 today. As I mentioned before my name is 11 Veronica Abreu. I, with my colleague, Joe Ming 12 represent Bentley Pharmaceuticals, the 13 defendant in this action. As you know the 14 plaintiffs are Ethypharm Spain and Ethypharm 15 France represented by Mr. Bostwick and Mr. 16 Fine. 17 Would you state and if you haven't 18 done so already spell your full name for the 19 record. 20 A. My name is Yves Liorzou. It's 21 written Yves, Y-V-E-S and Liorzou is</p>	<p style="text-align: right;">Page 9</p> <p>1 recording that. 2 If at any point I ask you a question 3 that seems unclear, please let me know and I 4 will clarify that for you. 5 A. (Witness nodding head.) 6 Q. And as you know, you have just been 7 sworn in and your answers will be under oath 8 and we just want to make sure you understand 9 that. 10 We ask just so she can also take 11 down a clear record that one person speak at a 12 time and because we have an interpreter here 13 today that can be particularly tricky. 14 And as you have already seen so she 15 has a chance to translate everything we would 16 like to have pauses. So if your answer, you 17 think, is going to be long, we ask that you 18 pause a bit to give her a chance to translate. 19 We will be taking breaks throughout 20 the day but if at any time you need a break 21 just let me know. The only thing that we ask</p>

3 (Pages 6 to 9)

<p style="text-align: right;">Page 10</p> <p>1 is that we will not take a break between a 2 question and an answer. And we also ask that 3 you please do not discuss your testimony today 4 with Ethypharm's attorneys during the breaks. 5 Do you have any questions at this 6 point? 7 A. No. It's clear. 8 MR. BOSTWICK: I have just one 9 comment. This is Dwight Bostwick. 10 Mr. Liorzou -- we have discussed 11 this at the break, but I want to put it on the 12 record. Mr. Liorzou does speak very nice 13 English. To make sure that everything is 14 understood we are requesting that the 15 translator translate each question and then Mr. 16 Liorzou, depending on his comfort level, can 17 either answer in English or French at his 18 option. And he may get a little more tired 19 during the end of the day because it's more 20 difficult obviously in a foreign language but 21 that's the procedure we have agreed to.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I work mainly for an American 2 company in the food supplement business. 3 Q. And what is the name of that 4 American company? 5 A. Kemin Health. 6 Q. And what kind of responsibilities do 7 you do? What roles do you play for that 8 American company? 9 A. I am sales manager for France. 10 Q. Now, as a consultant do you do any 11 work with Ethypharm France or any of its 12 subsidiaries? 13 A. No. 14 Q. Do you know if the American company 15 for whom you do consulting does any business 16 with Ethypharm France or Ethypharm Spain? 17 A. No. No. 18 Q. At some point in your career were 19 you employed at Ethypharm? 20 A. Yes. 21 Q. And when was that?</p>
<p style="text-align: right;">Page 11</p> <p>1 MS. ABREU: Yes. 2 BY MS. ABREU: 3 Q. Mr. Liorzou, are you currently 4 employed? 5 A. Yes, I am working in -- by my own as 6 a consultant. 7 Q. As a consultant? 8 A. Yes. 9 Q. So you work out of your home? 10 A. No. I have an office. 11 Q. You have an office? 12 A. Yeah. 13 Q. And where is your office located? 14 A. Oh, it's 5 kilometers from my home. 15 It's town named Paissy in France. 16 Q. How long have you been working as a 17 consultant? 18 A. More or less one and a half, two 19 years. One and a half year. 20 Q. And what kind of consulting do you 21 do?</p>	<p style="text-align: right;">Page 13</p> <p>1 A. From '79 to 2004. 2 Q. And at which Ethypharm offices were 3 you employed? 4 THE INTERPRETER: I'm sorry. I was 5 just putting the date. 6 BY MS. ABREU: 7 Q. At which Ethypharm offices was he 8 employed? 9 A. Different -- I spent some time in 10 the factory of Oudeus which is a factory of 11 Ethypharm. I spent three years in Brazil for 12 Ethypharm. And after I have been also in St. 13 Cloud which is head office. St. Cloud. 14 Q. So would it be fair to say that you 15 worked for Ethypharm France and Ethypharm -- 16 does Ethypharm have a subsidiary in Brazil? 17 MR. BOSTWICK: Objection. Form. 18 BY MS. ABREU: 19 Q. You can answer the question? 20 THE WITNESS: I have worked for 21 Ethypharm in general. And I have been delegate</p>

4 (Pages 10 to 13)

ESQUIRE DEPOSITION SERVICES

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<p style="text-align: right;">Page 14</p> <p>1 or sent to Brazil to create Ethypharm Brazil. 2 And I stayed there as a general director for 3 three years. 4 BY MS. ABREU: 5 Q. And which three years were those 6 that you spent in Brazil? 7 A. '85 to '88. 8 Q. And between 1979 and 2004 what were 9 your titles at Ethypharm? 10 A. When I started with Ethypharm in '79 11 we were eight people so I was -- I started as 12 quality assurance manager. After I worked in 13 manufacturing and when I came back from Brazil 14 I started as -- I worked as licensing manager 15 and commercial director and I ended vice 16 president, to be short -- to make short. 17 Q. Do you recall approximately what 18 years you worked as licensing manager? 19 A. Around -- let's see. To be clear, 20 in Ethypharm at the time there were no real 21 definitive -- definite function, okay? So when</p>	<p style="text-align: right;">Page 16</p> <p>1 A. I don't remember this. I know that 2 when I left in '85 more or less it was around 3 50 people. When I came back in '88 I don't 4 know. I think -- I believe it was less than 5 100 but I'm not sure honestly. 6 Q. When you left in 2004 how many 7 people were there at that time? 8 A. It was around 600, I think. 9 Q. Aside from being -- you mentioned 10 you were responsible for the Brazilian, 11 Italian and Spanish subsidiaries as a 12 commercial director and vice president. 13 A. Yes. 14 Q. Let me finish the question. 15 Apart from supervising these 16 subsidiaries what were your responsibilities as 17 commercial director and vice president? 18 A. In fact, I had two responsibilities. 19 I was in charge of licensing. Licensing the 20 product by Ethypharm and I had a team of, I 21 don't remember, four people, let's say, more or</p>
<p style="text-align: right;">Page 15</p> <p>1 I came back from Brazil in '88, let's say I had 2 this function of licensing manager more or 3 less, yeah. And until, I don't know, '99 or 4 2000. And after I was involved in more other 5 activities. 6 Q. So from 2000 to 2004 you were both 7 commercial director and vice president? 8 A. Yeah, because I had larger team, 9 let's say. I was in charge of subsidiary and 10 things like that. 11 Q. Which subsidiaries were you in 12 charge of? 13 MR. BOSTWICK: Can we wait for the 14 translation. 15 A. Of course the Brazilian I would 16 always be in. And Italian and Spanish. But 17 the dates I'm not so sure exactly of the dates. 18 BY MS. ABREU: 19 Q. When you came back from Brazil in 20 1988 how big was Ethypharm? Was it more than 21 eight people at that time?</p>	<p style="text-align: right;">Page 17</p> <p>1 less, in charge of different geographic areas, 2 and myself I was directly involved with Latin 3 America. This is for -- this is for licensing 4 part. 5 And also I was in charge of customer 6 service. Let's say all the clients we had we 7 supplied them with products so I was in charge 8 of customer service and I had six or seven 9 people for customer service. 10 Q. In your licensing team you mentioned 11 there were four people. What were the names of 12 those four people, do you remember? 13 MR. BOSTWICK: Object to the 14 characterization. You can answer. 15 A. This year, for instance, I think 16 more or less historically Sylire Fondaych. 17 Fondaych is written F-O-N-D-A-Y-C-H-E. 18 Something like that. John Philippe Lacombe. 19 It's written L-A-C-O-M-B. Vincent Guarou, 20 G-U-A-R-O-U. Sologue Coegnard, 21 C-O-E-G-N-A-R-D. One was in charge of, let's</p>

5 (Pages 14 to 17)

<p style="text-align: right;">Page 18</p> <p>1 say, Germany and some countries. Another one 2 was France and UK. Another one -- it was 3 Italy. 4 Q. Were any of them in charge of Spain? 5 A. No. 6 Q. You also mention you worked with a 7 team in your role for customer service. Do you 8 remember who those people were? 9 A. The boss was Nathalie Neves. Neves, 10 N-E-V-E-S. And there was four or five ladies. 11 I don't remember the other names. 12 Q. And just to clarify was your role as 13 customer service part of your -- is that when 14 you were commercial director? Is that part of 15 that? 16 A. Yes. 17 Q. And what were your responsibilities 18 as vice president? 19 A. It was -- I was part of the 20 concierge -- not directory -- what is the name? 21 THE INTERPRETER: Board of director.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Do you remember which two, three 2 years those were? 3 A. No, I don't. Exactly around 2000 4 more or less. Around 2000. This is difficult 5 to fix exactly the dates. 6 Q. Sure. Just to the best of your 7 recollection. 8 A. So jack Pierre Germain. Industry 9 director in this period Philippe Boudal. 10 THE INTERPRETER: Industry director 11 Philippe Boudal. P-H-I-L-I-P-P-E, B-O-U-D-A-L. 12 A. I think Roseline Joanesse. 13 THE INTERPRETER: R-O-S-E-L-I-N-E. 14 THE WITNESS: Joanesse, 15 J-O-A-N-E-S-S-E. She was general director or 16 something. Paeal Oury, research and 17 development. Paeal Oury is written O-U-R-Y. 18 I don't remember. Mr. Esmieux, Esmieux, 19 E-S-M-I-E-U-X, I think. Esmieux for finance. 20 Perhaps one or two more I don't remember 21 completely.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Board of director. 2 BY MS. ABREU: 3 Q. Who else was on the board of 4 directors with you? 5 MR. BOSTWICK: Objection. Time 6 frame. 7 BY MS. ABREU: 8 Q. While you were vice president and 9 while you worked at Ethypharm who else was on 10 the board of directors? 11 A. Of course, the general manager. You 12 know, it depends on the period because there 13 was some fluctuation. Which period do you 14 exactly want to? 15 Q. Say from 1999 through when you left 16 in 2004? 17 A. For instance, as a general manager 18 in the period, you know, more or less was 19 Pierre Germain. In fact, Pierre Germain in 20 fact I think he stay just only two years, three 21 years. Maximum two, three years.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. Okay. Fair enough. 2 In your position as licensing 3 manager do you remember who you reported to? 4 A. Pierre Germain. At the time Pierre 5 Germain. Before Gerard Leduc after Pierre 6 Germain left -- when Pierre Germain left Gerard 7 Leduc. 8 Q. And in your role as commercial 9 director do you remember who you reported to? 10 A. Same. 11 Q. Was it the same people as in your 12 role as vice president? 13 A. I would like to repeat. 14 Q. Sure. 15 A. Before, let's say, the arrival of 16 Pierre Germain there were no -- I was not 17 member of this particular organization. 18 THE INTERPRETER: Board of director. 19 A. Board of director. There was no 20 real function define. I was director of 21 licensing at the time before. Then when he</p>

6 (Pages 18 to 21)

<p style="text-align: right;">Page 22</p> <p>1 arrived he organized things better, let's say, 2 and so I took this position of director of 3 commercial and I was depending -- reporting to 4 him, of course, and after when he left I was 5 reporting to Gerard Leduc to be more precise. 6 THE INTERPRETER: Before Pierre 7 Germain he was reporting to Gerard Leduc. 8 BY MS. ABREU: 9 Q. Did you also say that after -- just 10 to clarify, did you also say that after Germain 11 left you reported to Leduc again? 12 A. I reported to Leduc, yes. 13 MR. BOSTWICK: Let's just make sure 14 there is some time for translation. We 15 appreciate, Mr. Liorzou, that you are making a 16 good effort in English here and it is quite 17 helpful for us who don't speak French. It's 18 much better for me, but just to make sure you 19 understand the questions as they are given 20 please pause so she can translate. 21 A. When there is doubt or something I</p>	<p style="text-align: right;">Page 24</p> <p>1 BY MS. ABREU: 2 Q. Anyone else besides Adolfo De 3 Basilio. 4 THE WITNESS: Yes. There was two. 5 Minimum at least two other person. 6 BY MS. ABREU: 7 Q. Do you recall their names? 8 A. Yes. Eloy I know is the first name. 9 Eloy and Ignacio. 10 Q. Eloy Gonzalez? 11 A. Eloy Gonzales, yes, that's right. 12 And Ignacio -- 13 Q. Ignacio Alvarez? 14 A. I don't know. I don't remember. 15 Q. Were they at the Ethypharm Spain 16 throughout your tenure at Ethypharm in France? 17 A. I don't know how long there have 18 been Ethypharm Spain. There were Ethypharm 19 Spain during this period, but I don't know how 20 long. I don't know how many times. I don't 21 know.</p>
<p style="text-align: right;">Page 23</p> <p>1 come back. 2 MR. BOSTWICK: Right. Right. And 3 the same thing if there is a difficult concept 4 you can explain in French if you feel more 5 comfortable. 6 A. It is reflexes. 7 MR. BOSTWICK: It's hard because you 8 are having a conversation. 9 MS. ABREU: If you need her to 10 translate certainly don't hesitate to ask. 11 A. It is okay. Working well. 12 BY MS. ABREU: 13 Q. You mentioned that you were I guess 14 in your role as commercial director and also as 15 vice president you were responsible for 16 supervising Ethypharm Spain. 17 A. Yes. 18 Q. Who were your primary contacts at 19 Ethypharm Spain. 20 A. Adolfo De Basilio. 21 THE INTERPRETER: Adolfo De Basilio.</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. So you don't remember when they 2 started? 3 A. I don't know exactly. I don't know. 4 No. I don't know honestly. 5 Q. Okay. Fair enough. 6 What were the circumstances of your 7 departure from Ethypharm in 2004? 8 A. I left Ethypharm because we name in 9 France of a process here, a social plan. 10 THE WITNESS: I left Ethypharm 11 France in 2004 because we had -- it's a social 12 plan we decide with the direction to get them 13 severed from the society. 14 May I ask a question to be sure I 15 understand? 16 MS. ABREU: Sure. 17 THE WITNESS: Because of financial 18 reasons you have some accord with the 19 government -- agreement with the government and 20 you could receive some amount. It is not 21 totally a severance package but a retirement</p>

7 (Pages 22 to 25)

<p style="text-align: right;">Page 26</p> <p>1 package but some people could get out of the 2 firm and receive a little money for that. 3 BY MS. ABREU: 4 Q. Do you remember approximately when 5 in 2004 that happened? 6 A. Yes, precisely. 7 Q. When was that? 8 A. I left Ethypharm the 5th of July 9 2004. 10 Q. And who was involved in the decision 11 to make the severance plan for you? 12 A. The general manager at the time. 13 Q. Who was that? 14 A. It was -- the general manager was 15 Mr. Quintrald, Q-U-I-N-T-R-A-L-D. 16 Q. And did anyone else leave at the 17 same time as you according to that social plan? 18 A. Several people, yeah. 19 Q. And who were those people? 20 A. Different employees at different 21 level. I don't know exactly. I know that it</p>	<p style="text-align: right;">Page 28</p> <p>1 a little bit now about your language skills. 2 Evidently your English is quite good. 3 THE INTERPRETER: Thank you. 4 BY MS. ABREU: 5 Q. You're welcome. Do you feel 6 comfortable speaking in English? 7 A. Yes. Depends with whom to be clear. 8 Depends with whom. It depends how long. You 9 know, in each language -- I speak different 10 languages and I can measure my quality of 11 language to the time. 12 Q. Fair enough. 13 A. After a while already -- I was 14 telling Dwight yesterday after a while I get 15 tired and my English becomes less fluent and my 16 vocabulary is poorer and poorer. Okay? 17 Q. I understand. 18 A. And also the understanding -- the 19 understanding depends on the people. I 20 understand you quite well. 21 Q. Okay. Thank you.</p>
<p style="text-align: right;">Page 27</p> <p>1 were around 100 people. 2 Q. And were they all employed in 3 France? 4 THE WITNESS: I don't know. 5 A. I think, mainly. Yeah, I think 6 mainly. 7 Q. Do you recall if any of those people 8 who left as part of the social plan were 9 employed in Ethypharm Spain? 10 A. No. Ethypharm Spain was closed 11 before. 12 Q. Okay. 13 A. Spain was closed before this 14 happened. 15 Q. Okay. Do you remember when Spain 16 was closed? 17 A. No, I don't remember. Don't 18 remember. The years, I don't know. 2003 19 perhaps or something like that. I don't know. 20 I can make a mistake. 21 Q. Do you -- and I just want to ask you</p>	<p style="text-align: right;">Page 29</p> <p>1 A. I tell you it is a question of the 2 speed, the accent and it depends. 3 Q. Sure. While you were employed at 4 Ethypharm did you also speak English as you do 5 today? 6 A. It was more or less the same I 7 think. 8 Q. Do you speak Spanish? 9 A. I speak my Spanish. No, I don't 10 really speak Spanish. I speak Portuguese 11 because I live in Brazil and I travel a lot to 12 Latin America. So I speak a kind of bottom tin 13 nil. You know? Mixing of Spanish and 14 Portuguese. I can read Spanish more or less, 15 but when I have to speak it's really my 16 Spanish. It's not a problem in Latin America. 17 It's really a problem in Spain. In Spain I 18 have difficulties. 19 Q. You have difficulties? 20 A. Yes. 21 Q. Do you have difficulties reading say</p>

8 (Pages 26 to 29)

<p style="text-align: right;">Page 30</p> <p>1 a contract in Spanish?</p> <p>2 A. No. It takes time. I can read</p> <p>3 contract in Spanish. It's busy. It's work.</p> <p>4 But I can do it.</p> <p>5 Q. What do you mean by busy?</p> <p>6 A. I have to take care. I have to read</p> <p>7 all the names sometime. I have to try to</p> <p>8 understand. I can do it.</p> <p>9 Q. So it's difficult but --</p> <p>10 A. It's difficult. It's possible.</p> <p>11 Q. Would it be easier for you to read</p> <p>12 it in English than in Spanish?</p> <p>13 A. Oh, yes.</p> <p>14 Q. Mr. Liorzou, have you ever heard of</p> <p>15 my client Bentley Pharmaceuticals, Inc.?</p> <p>16 A. Yes.</p> <p>17 THE WITNESS: Yes, I already heard</p> <p>18 about them.</p> <p>19 BY MS. ABREU:</p> <p>20 Q. I will -- during this deposition I</p> <p>21 will refer to Bentley Pharmaceuticals, Inc.,</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Is it okay with you if I refer to</p> <p>2 Laboratorious Belmac as Belmac in today's</p> <p>3 deposition?</p> <p>4 A. Yes. I understand.</p> <p>5 Q. Thank you. Do you know what the</p> <p>6 business of Laboratorious Belmac is in Spain?</p> <p>7 Let me clarify that.</p> <p>8 A. Yeah. Maybe.</p> <p>9 Q. Not where it is but do you know --</p> <p>10 A. Which kind of --</p> <p>11 Q. What business?</p> <p>12 A. Yeah. Which kind --</p> <p>13 Q. What is the business of</p> <p>14 Laboratorious Belmac?</p> <p>15 A. Yes. Belmac in Spain is a</p> <p>16 pharmaceutical company. They have their own</p> <p>17 products on the market. And they are a factory</p> <p>18 where as they can manufacture products.</p> <p>19 Q. Do you know what products it has on</p> <p>20 the market in Spain?</p> <p>21 A. I know one.</p>
<p style="text-align: right;">Page 31</p> <p>1 the United States company as Bentley. Is that</p> <p>2 okay?</p> <p>3 A. Okay.</p> <p>4 Q. Have you ever heard of</p> <p>5 Laboratorious Belmac?</p> <p>6 A. Yes.</p> <p>7 Q. And what is your understanding of</p> <p>8 Laboratorious Belmac?</p> <p>9 MR. BOSTWICK: Objection. Vague.</p> <p>10 Form of the question.</p> <p>11 BY MS. ABREU:</p> <p>12 Q. What do you understand</p> <p>13 Laboratorious Belmac to be? Where is it</p> <p>14 located?</p> <p>15 MR. BOSTWICK: Objection. Compound.</p> <p>16 A. Belmac is located in Spain in</p> <p>17 Zaragoza.</p> <p>18 Q. Zaragoza. Okay. Do you know</p> <p>19 whether Belmac is related to Bentley?</p> <p>20 A. Yes. Belmac is a subsidiary of</p> <p>21 Bentley.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. And what is that one product?</p> <p>2 A. One of their product is Omeprazole.</p> <p>3 I don't remember the trade name in Spain but</p> <p>4 it's Omeprazole. Belmac Omeprazole. I don't</p> <p>5 remember.</p> <p>6 Q. Do you know if they are licensed by</p> <p>7 the -- authorized by the Spanish government to</p> <p>8 market Omeprazole?</p> <p>9 MR. BOSTWICK: Objection.</p> <p>10 Foundation.</p> <p>11 A. Yes, I believe because the product</p> <p>12 was on the Spanish market.</p> <p>13 Q. Let's go back to your role while you</p> <p>14 were working at Ethypharm in France and</p> <p>15 specifically while you supervised Ethypharm</p> <p>16 Spain.</p> <p>17 What was the relationship between</p> <p>18 Ethypharm France and Ethypharm Spain?</p> <p>19 MR. BOSTWICK: Objection. Vague.</p> <p>20 BY MS. ABREU:</p> <p>21 Q. You can answer the question.</p>

9 (Pages 30 to 33)

<p style="text-align: right;">Page 34</p> <p>1 A. You know, to be clear, the period 2 when I arrived it was a period -- when I 3 arrived as commercial manager it was a period 4 with there was some -- with the arrival of 5 Pierre Germain there was some mediation in the 6 state. He was the favor and everything, but 7 and so my -- when I arrived -- when I arrived 8 we had a subsidiary in Spain and this 9 subsidiary had to find new clients Ethypharm 10 for licensing and they were also taking care of 11 the relationship with Belmac. Which Belmac was 12 a manufacturer for us for different products. 13 Q. Was Belmac also a client? 14 A. Yes. 15 MR. BOSTWICK: Veronica, I just want 16 to point something out to Mr. Liorzou. When I 17 make an objection you can answer the question 18 -- if you understand the question you can 19 answer it. If you do not understand -- if you 20 are having difficulty understanding, please ask 21 for clarification. But unless I tell you don't</p>	<p style="text-align: right;">Page 36</p> <p>1 find clients for a particular product? 2 A. No, no. This should. This should 3 find clients for the benefit of Ethypharm in 4 general. All the product developed by 5 Ethypharm should be licensed to client in Spain 6 and registered in Spain which was involved to 7 find new clients. But this structure to be 8 used at the time was not working very well. It 9 was more -- there was more based on their 10 relationship with manufacturing at that time. 11 Q. Okay. 12 A. It was no developer of this. This 13 was my rule to delve up more this licensing 14 aspect in Spain which was not very well 15 developed at the time. 16 Q. At the time, okay. And you 17 mentioned that Spain was focused on 18 manufacturing. Who manufactured for Ethypharm 19 Spain? 20 A. Belmac was a manufacturer of some 21 products and this was followed by Ethypharm</p>
<p style="text-align: right;">Page 35</p> <p>1 answer, it is a matter of -- 2 MS. ABREU: It is an administrative 3 matter. 4 MR. BOSTWICK: It's a matter between 5 lawyers. 6 A. It is always quite stressing. 7 MR. BOSTWICK: And I think it's best 8 if all the questions do go through the 9 interpreter because that just will help assure 10 that you have understood what the question is. 11 A. Yes. I have some question. Yeah. 12 Okay. 13 BY MS. ABREU: 14 Q. You mentioned that Ethypharm Spain, 15 the Spanish subsidiary of Ethypharm was in part 16 intended to find new clients for Ethypharm. Is 17 that an accurate statement? 18 MR. BOSTWICK: Objection. 19 A. Yes. 20 BY MS. ABREU: 21 Q. Were they -- was that intended to</p>	<p style="text-align: right;">Page 37</p> <p>1 Spain. 2 Q. What do you mean by "was followed by 3 Ethypharm Spain"? 4 A. I mean that Ethypharm Spain was 5 playing a role of customer service vis-a-vis 6 Belmac. 7 THE INTERPRETER: Ethypharm Spain 8 was having a role as or was taking the role of 9 customer service for Belmac. 10 BY MS. ABREU: 11 Q. And what did Ethypharm Spain do in 12 its role as customer service for Belmac? 13 THE INTERPRETER: For Ethypharm or 14 for Belmac in your question? 15 MS. ABREU: For Ethypharm. 16 A. Ethypharm -- 17 THE WITNESS: In my memory the 18 client was receiving all the orders from the 19 customer. 20 A. For some products. 21 THE WITNESS: For some products.</p>

10 (Pages 34 to 37)

<p style="text-align: right;">Page 38</p> <p>1 A. Ethypharm was giving others to 2 Belmac. Belmac was manufacturing and 3 delivering the products to most of Ethypharm. 4 Yes. And we were invoicing -- honestly I don't 5 remember if it was Belmac or Ethypharm. I 6 don't remember exactly. I know also that there 7 was some -- the Ethypharm was taking care of 8 the supply of some ingredients to Belmac. 9 Q. And when you say Belmac manufactured 10 and sold some products for Ethypharm's clients 11 do you recall what those products were? 12 A. One very clearly. It's Omeprazole, 13 of course. Two or three other product. I 14 remember one was Aspirin. Acid acetylide I'm 15 sorry. It's a trademark. Acid acetylide, AAS, 16 acid acetylide. It's Aspirin. 17 Q. Okay. So they are the same. Okay. 18 A. Lansoprazole. And there were two 19 other products but I am confused. I think 20 Indomethacin but I'm not sure. I think. 21 Q. And in your role as commercial</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. Do you remember if it was early in 2 the year or -- 3 A. No. It was the beginning of the 4 year. 5 And the second time in Paris in St. 6 Cloud. 7 Q. In St. Cloud? 8 A. In St. Cloud at the end of 2000, I 9 think. 10 Q. Going back to the Madrid meeting in 11 early 2000 do you recall who attended that 12 meeting? 13 A. Yes. 14 Q. And who were those people? 15 A. I remember -- to be clear from our 16 side I remember that we went to Madrid with 17 Pierre Germain, Philippe Boudal. Boudal, 18 B-O-U-D-A-L, myself, and we had a meeting with 19 Adolfo De Basilio in Madrid. And after we had 20 lunch with people of Belmac and perhaps also of 21 Bentley. I don't know.</p>
<p style="text-align: right;">Page 39</p> <p>1 director did you have any direct contacts with 2 anyone at Belmac? 3 A. No. 4 Q. Who did you talk to? 5 A. When? 6 Q. At any time during your tenure as 7 commercial director. 8 A. No, no. I had some contacts, yes, 9 but we had some meetings. We had -- yeah, we 10 had some meetings at some period but let's say 11 that I have never been to Zaragosa, for 12 instance, and I met the people of Belmac two or 13 three times. 14 Q. Do you recall when? 15 A. I met them once in Madrid. I don't 16 exactly remember which date. 17 Q. Do you remember which year? 18 A. 2000. Yes, 2000. 19 Q. Do you remember approximately what 20 month in 2000? 21 A. No. No.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Who were the people of Belmac at 2 that lunch? 3 A. I honestly don't remember very well. 4 I believe that we met Herrera and Mr. Murphy 5 but I am not sure. We had lunch with people of 6 Belmac but honestly it was very quick and I 7 don't remember very well. I remember this date 8 because it was -- we took a very early plane. 9 I remember because it doesn't happen often. We 10 took an early plane with Pierre Germain, 11 Philippe Boudal and it was overbooked so -- 12 Q. So it wasn't a good day? 13 A. We had to wait two hours at the 14 airport and made a big scandal because Pierre 15 Germain is a very tough guy and we were given a 16 lot of money for that. And so we arrive very 17 late in Madrid. We had this quick meeting 18 because it was great effort. We met Adolfo De 19 Basilio at that time to explaining what was the 20 new rules we wanted to work, and after we had 21 lunch with Belmac and perhaps Mr. Murphy I'm</p>

11 (Pages 38 to 41)

<p style="text-align: right;">Page 42</p> <p>1 not sure. Okay. But I don't remember anyway.</p> <p>2 Q. Okay. Do you remember Mr. Herrera</p> <p>3 being there as well?</p> <p>4 A. No, I don't remember.</p> <p>5 Q. And you mentioned you are not sure</p> <p>6 that Mr. Murphy was there, correct?</p> <p>7 A. No, I'm not sure.</p> <p>8 Q. Do you know who Mr. Herrera is at</p> <p>9 Belmac?</p> <p>10 A. Yes.</p> <p>11 Q. Who is he at Belmac? What role does</p> <p>12 he play?</p> <p>13 A. I think he is managing director of</p> <p>14 Belmac and responsible for Belmac or was</p> <p>15 responsible for Belmac.</p> <p>16 Q. And do you know who James Murphy is?</p> <p>17 A. Yes. James Murphy is, I think, the</p> <p>18 chairman of Bentley.</p> <p>19 Q. Did he ever tell you that himself?</p> <p>20 A. Yeah, because he gave -- he gave me</p> <p>21 his card.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Honestly as I told you, I don't know</p> <p>2 if it is in Madrid when I met people of Belmac</p> <p>3 and Bentley or if it is the second time. This</p> <p>4 is second time, sure, I met Mr. Murphy in Paris</p> <p>5 the same year.</p> <p>6 Q. Is this the St. Cloud meeting at the</p> <p>7 end of 2000? Is that what you mean by the</p> <p>8 second time?</p> <p>9 A. Yes.</p> <p>10 Q. And we will talk about that a little</p> <p>11 later but I want to focus on the first meeting</p> <p>12 first, the one in Madrid in 2000.</p> <p>13 At that time or any time during your</p> <p>14 tenure at Ethypharm were you aware of whether</p> <p>15 Mr. Murphy had a position at Belmac in Spain?</p> <p>16 A. No. No. Honestly, no.</p> <p>17 THE WITNESS: No. Honestly, no.</p> <p>18 BY MS. ABREU:</p> <p>19 Q. Do you recall at the meeting in</p> <p>20 Madrid in early 2000 at the lunch meeting with</p> <p>21 -- that you mentioned Mr. Herrera attended do</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. And this is what you brought with</p> <p>2 you that's marked as EP 009250?</p> <p>3 A. Yes, yeah.</p> <p>4 MR. BOSTWICK: As long as we -- if</p> <p>5 you are going to refer to it we probably should</p> <p>6 just mark it as Exhibit 1.</p> <p>7 MS. ABREU: Let's mark that as</p> <p>8 Exhibit 1.</p> <p>9 (Deposition Exhibit No. 1 was marked</p> <p>10 for identification.)</p> <p>11 BY MS. ABREU:</p> <p>12 Q. Have you had a chance to review</p> <p>13 Exhibit 1?</p> <p>14 A. It was in my pocket.</p> <p>15 Q. I know it's very long.</p> <p>16 A. It's good to ask the question.</p> <p>17 Q. Fair enough. Do you remember seeing</p> <p>18 this before?</p> <p>19 A. Yes.</p> <p>20 Q. And when do you remember was the</p> <p>21 first time you saw that?</p>	<p style="text-align: right;">Page 45</p> <p>1 you recall what was discussed at that meeting?</p> <p>2 A. No. Honestly, no. No, no, no.</p> <p>3 Q. Do you recall what was the purpose</p> <p>4 of that lunch meeting?</p> <p>5 MR. BOSTWICK: This is the meeting</p> <p>6 in Spain?</p> <p>7 MS. ABREU: The lunch meeting in</p> <p>8 Spain in Madrid in 2000.</p> <p>9 A. No. I told you I was not -- myself</p> <p>10 I was not really interested by this meeting. I</p> <p>11 was more interest when we went to Spain to the</p> <p>12 conversation we had with Adolfo De Basilio</p> <p>13 because the purpose was to try to modify the</p> <p>14 structure of Ethypharm Spain to focus its</p> <p>15 activity more on licensing in Spain and to</p> <p>16 operate all the customer service it was doing</p> <p>17 in Spain to operate it in France.</p> <p>18 Q. Oh, really?</p> <p>19 A. To develop operation so perhaps --</p> <p>20 well, it was an opportunity to meet up with</p> <p>21 because we had some problems at the time, I</p>

12 (Pages 42 to 45)

<p style="text-align: right;">Page 46</p> <p>1 don't know, with Belmac or -- I don't know what 2 was exactly the purpose of the visit. I don't 3 remember very well. 4 Q. And was the first part of that 5 meeting, the part with Mr. De Basilio, was that 6 -- where was that located? 7 THE WITNESS: In the office. 8 BY MS. ABREU: 9 Q. In which office? 10 A. In the office of Ethypharm Spain. I 11 don't remember the address. Colon. Something 12 colon. 13 Q. Fair enough. Now, you mentioned 14 that part of that purpose was to move clients 15 back to France? 16 MR. BOSTWICK: I'm going to object 17 to the recharacterization of his testimony. 18 A. Yes, precisely. Not to recuperate 19 the client because the clients were from Spain, 20 but it was to -- the purpose was to recuperate 21 the customer service to centralize customer</p>	<p style="text-align: right;">Page 48</p> <p>1 It was fixed, this meeting, with them but I 2 don't remember exactly what was the purpose and 3 which was where. I don't remember. I honestly 4 don't remember. 5 Q. Do you have any understanding as to 6 who fixed that meeting with Mr. Herrera? 7 A. I think it was been established by 8 Adolfo De Basilio. 9 Q. So just to clarify this for the 10 record, you don't remember anything that was 11 discussed at that meeting; is that correct? 12 A. No. No. No, no, no, not really. 13 Q. How about -- let's focus on the 14 meeting in St. Cloud now at the end of 2000. 15 MR. BOSTWICK: Does it makes 16 sense -- we have been going for an hour and 15 17 minutes to break at this juncture? 18 MS. ABREU: Let me just finish this 19 line of questioning and then we can take a 20 break. 21 A. Okay.</p>
<p style="text-align: right;">Page 47</p> <p>1 service in France because we wanted to create a 2 real customer service in France and we wanted 3 to incorporate also all Spanish activities 4 inside this customer service. 5 Q. So were you going to move customer 6 service from Spain back to France? 7 A. No, because the people -- we were 8 going to close the office in Spain. The people 9 who were involved in this -- we wanted to have 10 a light office, light, small office in Spain in 11 fact. Okay. Focused on licensing for Spanish 12 and Portuguese market. 13 Q. Who was involved at that time in 14 customer service in Spain? 15 A. Well, it was -- it was two guys I 16 know I mentioned; Eloy and Ignacio. 17 Q. And do you recall how -- also at 18 that Madrid early 2000 meeting after you met 19 with Mr. De Basilio do you recall how it came 20 about that you went to lunch with Mr. Herrera? 21 A. No, no. It was previous, you know?</p>	<p style="text-align: right;">Page 49</p> <p>1 BY MS. ABREU: 2 Q. Do you recall approximately when at 3 the end of 2000 that was? Do you recall if it 4 was the fall, the winter? 5 A. It was -- I know it was at the end 6 of the year. I think it was November or 7 something like that. I don't know the exact 8 date but it was in this area. 9 Q. And where was the meeting? Where in 10 St. Cloud was the meeting held? 11 A. At a restaurant in France. 12 Q. You have good meetings in France. 13 A. Yeah, look. No, uhm, it was in St. 14 Cloud, yes, at a restaurant close to the 15 office. 16 Q. Okay. 17 A. I remember. This I remember very 18 well. 19 Q. And when you say close to the office 20 you mean the Ethypharm France's office? 21 A. Yes.</p>

13 (Pages 46 to 49)

<p style="text-align: right;">Page 50</p> <p>1 Q. Do you recall who was in attendance 2 at that meeting?</p> <p>3 A. Yes.</p> <p>4 Q. And who was at that meeting?</p> <p>5 A. There were different people. They 6 were from Ethypharm France from Ethypharm 7 industry. Gerard Leduc, Pierre Germain, 8 myself. From Ethypharm Spain Adolfo De 9 Basilio, Herrera from Belmac and Murphy from 10 Bentley.</p> <p>11 Q. Anyone else?</p> <p>12 A. I don't believe, no.</p> <p>13 Q. Do you recall what the purpose of 14 that restaurant lunch meeting was? Was it 15 lunch or was it dinner, do you recall?</p> <p>16 A. It was lunch. In fact, we had two 17 tables. We had some problems for organization 18 because due to the fact that we wanted to keep 19 out from Spain customer service, you know. We 20 wanted to change the organization there and I 21 told you that some ingredients were supplied by</p>	<p style="text-align: right;">Page 52</p> <p>1 that were discussed at that time?</p> <p>2 A. Well, I was told after, you know, 3 because I made some memos at this time and so I 4 -- this spoke of what would be the future of 5 the relationship between the two companies and 6 they wanted to establish some contract between 7 Ethypharm and I don't know Bentley perhaps or 8 Belmac. I don't know exactly which was whom 9 and they wanted to discuss some more important 10 subject I told you.</p> <p>11 Q. When you say discuss the 12 relationship between the two companies which 13 two companies are you referring to?</p> <p>14 A. It was the relationship between I 15 think Ethypharm and Bentley or Belmac. I don't 16 know. Between -- I think -- well, it was a 17 discussion between Murphy and Leduc. So from 18 which company I think Murphy was speaking for 19 Bentley.</p> <p>20 Q. Did Murphy say he was speaking for 21 Bentley, to your knowledge?</p>
<p style="text-align: right;">Page 51</p> <p>1 the Spanish Ethypharm Spain to Belmac and so we 2 wanted to make this seem more simple. We 3 wanted this kind of conversation so we -- in 4 fact, we had two tables. We had a meeting with 5 the --</p> <p>6 THE INTERPRETER: Executive.</p> <p>7 A. So I was taking part of this to 8 organize with Herrera, myself and Adolfo De 9 Basilio.</p> <p>10 BY MS. ABREU:</p> <p>11 Q. Was that at the first table?</p> <p>12 A. The first table, yeah. We spoke of, 13 I don't know, who will supply to when or to 14 whom the ingredients will be invoiced to whom. 15 You know this kind of thing. Then this was 16 another table at the other corner of the 17 restaurant with a VP and with Leduc, Murphy and 18 Pierre Germain and they discussed more, let's 19 say, important subjects.</p> <p>20 Q. Do you have any understanding or any 21 knowledge of what those important subjects were</p>	<p style="text-align: right;">Page 53</p> <p>1 A. Now, this I don't know during the -- 2 I don't know. This I can't tell you.</p> <p>3 Q. Just to backtrack a little bit. You 4 said you heard about the discussion at that 5 table. Who told you about that discussion, do 6 you remember?</p> <p>7 A. No. I believe it was John Leduc 8 because I asked him, of course, or perhaps it 9 was Gerard Leduc and Pierre Germain. I made a 10 kind of summary of their discussions.</p> <p>11 Q. When you say -- you mentioned 12 earlier the relationship between the two 13 companies and one of the companies was 14 Ethypharm, do you know whether that was 15 Ethypharm in France or Ethypharm in Spain that 16 was discussed at table 2 with Leduc?</p> <p>17 A. Table 1 I tell you it was really 18 with Adolfo, myself, Herrera. It was really a 19 discussion concerning -- it's logistic problems 20 between -- it was the three companies in fact; 21 Belmac, Ethypharm Spain and Ethypharm France to</p>

14 (Pages 50 to 53)

<p style="text-align: right;">Page 54</p> <p>1 organize in order. And on the other table it 2 was really a discussion between Ethypharm, 3 Ethypharm, Ethypharm, the mother company and 4 Murphy. Murphy, I don't know. For me as it 5 was introduced -- he was introduced as Bentley 6 because he gave me his card as Bentley. I 7 believe it was for the relationship between 8 Bentley and Ethypharm to my opinion. 9 Q. When you say Ethypharm, the mother 10 company, you mean Ethypharm France? 11 A. Yes. 12 Q. And when you mentioned that to you 13 Murphy was introduced as Bentley is that 14 business card the only basis for that 15 statement? 16 A. Yes, let's say. Also -- well, I 17 would say that to my opinion if we met in two 18 tables it was not for fun. I mean, Mr. Leduc 19 wanted to speak with Bentley because he was a 20 guy who was in charge of -- he was a 21 responsible guy, the guy who was deciding.</p>	<p style="text-align: right;">Page 56</p> <p>1 logistics of the relationship between Belmac 2 and Ethypharm Spain and Ethypharm France. Is 3 that your understanding? Is that a correct 4 statement of your testimony? 5 A. Yeah. 6 Q. Was that conversation pertaining to 7 Omeprazole or any of the other drugs that you 8 had mentioned earlier that Belmac made for 9 Ethypharm? 10 A. Yes. It was -- yeah. It was what 11 was manufactured in Belmac. 12 Q. And -- 13 A. And Omeprazole, Lansoprazole. I 14 told you Aspirin and perhaps acid acetylide. 15 Yeah. 16 Q. What kind of logistics did you 17 discuss at that table about the manufacture of 18 Omeprazole in Spain? 19 A. I don't know. It's too far. 20 Honestly. It's too far. I remember that we 21 had some discussion of who would advise, who</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Did Mr. Leduc set up this lunch 2 meeting? 3 A. I don't know. I don't know. 4 Q. Do you have any knowledge as to 5 whether anybody else at Ethypharm set up this 6 meeting? 7 A. Could be Adolfo De Basilio or so -- 8 De Basilio it can be. 9 Q. Okay. So... 10 A. I think -- as I explain to you, I 11 think there were two different subjects to be 12 discussed. Seemed realistic problems and this 13 I think Adolfo De Basilio, myself, we were 14 interested to solve some problems and there 15 were more general problems and I think that 16 this was more the point of Mr. Leduc, for 17 instance. 18 Q. Let's focus on table 1 first, on 19 your table. That is the one that you mentioned 20 that De Basilio and Mr. Herrera were at that 21 table. You mentioned you were discussing the</p>	<p style="text-align: right;">Page 57</p> <p>1 would be supplied, this, that. It was really 2 logistic problems. 3 Q. Do you recall whether you discussed 4 clients? 5 A. I don't know. I don't -- I think it 6 was more general than -- I don't know. 7 Q. And just to clarify this for the 8 record, do you recall whether the logistics you 9 are discussing for the manufacture of 10 Omeprazole and the other drugs that you 11 mentioned were those drugs manufactured in 12 Spain? 13 A. Yes. 14 Q. And is that the drugs that Belmac 15 made in Spain? 16 THE WITNESS: For third party or for 17 themselves? 18 BY MS. ABREU: 19 Q. And when you mean themselves, for 20 Belmac themselves? 21 A. Omeprazole, for instance, was a</p>

15 (Pages 54 to 57)